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### RECEIVED

MAR 1 1 2015

PUBLIC SERVICE
COMMISSION

MONICA H. BRAUN DIRECT DIAL: (859) 231-3903 Monica.Braun@skofirm.com

March 11, 2015

Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Re: Jessamine South Elkhorn Water District

Case No. 2014-00084

Dear Mr. Derouen:

We enclose for filing an original and ten copies of Forest Hills Residents' Association, Inc.'s Hearing Data Requests in the above-captioned case. Thank you in advance for your assistance. Best regards.

Sincerely,

Stoll Keenon Ogden PLLC

Monica H. Bran

Monica H. Braun

**Enclosures** 

cc: Counsel of Record (w/encl.)

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### MAR 1 1 2015

#### BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

In the Matter of:

In the Matter of:
APPLICATION OF JESSAMINE-SOUTH ELKHORN WATER DISTRICT FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT AND FINANCE A WATERWORKS IMPROVEMENT PROJECT PURSUANT TO KRS 278.020 AND 278.300  CASE NO. 2014-00084  CASE NO. 2014-00084
CERTIFICATION OF RESPONSES TO INFORMATION REQUESTS
COMMONWEALTH OF KENTUCKY ) ) SS: COUNTY OF FAYETTE )
This is to certify that with regard to Forest Hills Residents' Association, Inc.'s March 11,
2015 Responses to the Hearing Data Requests, I have personal knowledge of the matters set forth
in the response for which I am identified as the witness, and the answers contained therein are
true and accurate to the best of my information, knowledge and belief formed after a reasonable
Date: 3 9 15  E. Clark Toleman
Subscribed and sworn to before me, a Notary Public in and before said County and State,
this 9 day of March, 2015.  Notary Public  Notary Public
My Commission Expires:

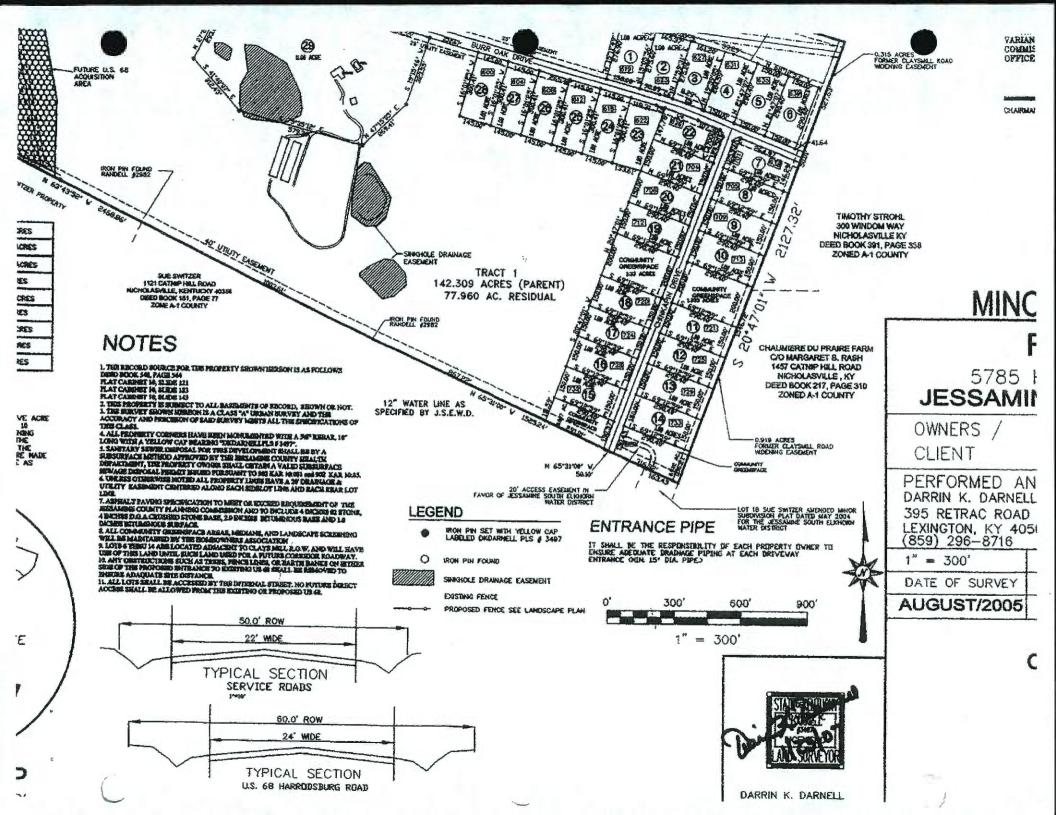
Notary I.D. Number

# JESSAMINE-SOUTH ELKHORN WATER DISTRICT CASE NO. 2014-00084 FOREST HILLS RESIDENTS' ASSOCIATION, INC.'S RESPONSE TO HEARING DATA REQUESTS

#### Witness: Counsel

1. Provide a copy of the Forest Hills Estates subdivision plat to which T. Logan Davis referred during his testimony at the hearing.

Response: See attached. The attached plat was produced by Jessamine-South Elkhorn Water District as part of Exhibit A to its answer in Case No. 2011-00138.



# JESSAMINE-SOUTH ELKHORN WATER DISTRICT CASE NO. 2014-00084 FOREST HILLS RESIDENTS' ASSOCIATION, INC.'S RESPONSE TO HEARING DATA REQUESTS

Witness: E. Clark Toleman

2. Provide a copy of the workpapers and calculations that were developed prior to Mr. Toleman's testimony at the hearing regarding the 20% diminution in value figure.

Response: See attached.

•	HEARING NOTES:
	PAIRED SALES OF LOTS AVENAGE LOSS 43.59
	708 CHINKAPIN 2006 - \$165,000 2 -43% 2012 95,000 5
2	618 BURN CAK 2006-170,000 } 2009-153,000 }-53% 2012-80,000
3.	
<u>h</u> .	729 CHINKAPIN 2006-\$170,000 7 2012-100450 3-402
5.	575 BURE DAK 2007- \$225,000 } - 14%
6.	622 BURR DAK 2010 - 9250,000 7 2012 - 84,000 5 - 67%
7,	619 BURR DAK 2006 - \$ 170,000 3 -15%
<b>8</b> .	405 BURR OAK 2010 - 1250,000 & -52%
	5

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FOREST HILLS AVERAGE LOT SAZE PRICE
2006 + 170,385
2007 \$ 177,436
2009 \$ 151,667
2012 \$ 96,636
2006 70 2012 - 43,28% (CHANGE)
INFIATION (Average) 2006-2012 2.38%
2.38 × 6 years 14.28%
ADJUSTED FOR INFLATION
- 43,28% + INFLATION-14.28% =
(-57.56%)